

To Whom It May Concern:

I believe that quality of life is of the utmost importance; yet quality based on a survey process that is highly subjective-based on current 'hot topic', and surveyor biases... leaves the whole process extremely skewed. Therefore, I submit that the CON process look to other / multiple indicators versus arbitrarily drawing a line that "might" indicate good performance.

Such as:

- *A state enforcement action resulting in a license revocation, reduced license capacity, or receivership within the last three years, or from the change of ownership date if the facility has come under common ownership or control within 24 months of the date of application.*
- *A filing for bankruptcy within the last three years, or from the change of ownership date if the facility has come under common ownership or control within 24 months of the application.*
- *Termination of a medical assistance provider agreement initiated by the Department or licensing and certification agency in another state, within the last three years, or from the change of ownership or control within 24 months of the date of the application.*
- *Current listing as a Special Focus Facility in Michigan or any other state along with poor resident satisfaction survey outcomes.*

(To meet the above condition, a facility designated as a Special Focus Facility must also demonstrate poor resident satisfaction survey outcomes (with rankings of good or excellent in overall satisfaction at a level to be determined by a workgroup) using an external process and specified nationally recognized tool for the past 12 months.)

- *Outstanding debt obligation to the state of Michigan for quality assurance assessment program or civil monetary penalties.*

I believe adopting one item for evaluation is not representative of the whole and the consumers; I encourage you to adopt more specific language that truly gets to the heart of the matter.

Sincerely,

Lori Herbig, COO-Healthcare
Sunset Association